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**SOAH DOCKET NO. 473-21-0538
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**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**DIRECT TESTIMONY
AND
WORKPAPERS
OF
TONY M. GEORGIS, P.E.

ON BEHALF OF THE
OFFICE OF PUBLIC UTILITY COUNSEL**

Tony Georgis
NewGen Strategies & Solutions, LLC
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MARCH 31, 2021

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TONY M. GEORGIS**

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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

3 A. My name is Tony Georgis. I am a Managing Director with NewGen Strategies &
4 Solutions, LLC. My office is located at 225 Union Boulevard, Suite 305, Lakewood,
5 Colorado 80228.

6 **Q. ON WHOSE BEHALF ARE YOU PRESENTING TESTIMONY IN THIS**
7 **PROCEEDING?**

8 A. I am presenting testimony on behalf of the Office of Public Utility Counsel (“OPUC”).

9 **Q. PLEASE OUTLINE YOUR EDUCATIONAL AND PROFESSIONAL**
10 **BACKGROUND.**

11 A. I have a Master of Business Administration degree from Texas A&M University, with
12 specialization in finance. I also earned a Bachelor of Science in Mechanical Engineering
13 from Texas A&M University. In addition to my undergraduate and graduate degrees, I am
14 a registered Professional Engineer in the states of Colorado and Louisiana. Attachment A
15 provides an additional description of my qualifications and education, and a list of dockets
16 in which I have provided expert testimony.

17 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE A REGULATORY AGENCY?**

18 A. Yes, I have. Attachment A includes a list of dockets in which I have provided expert
19 witness testimony before the Public Utility Commission of Texas (“Commission”) and
20 other regulatory bodies.

1 **Q. WHAT WORKPAPERS ARE YOU SPONSORING IN THIS PROCEEDING?**

2 A. I am sponsoring the following attached Workpaper, which demonstrates my modeling
3 process: Adjusted Cost of Service.

4 **Q. WAS YOUR TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT**
5 **SUPERVISION?**

6 A. Yes. I prepared the following testimony.

7 **II. PURPOSE AND SCOPE**

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

9 A. The purpose of my testimony is to present my analysis, findings, and recommendations
10 with respect to Southwestern Electric Power Company's ("SWEPCO" or the "Company")
11 cost of service based on an adjusted revenue requirement and development of a Dolet Hills
12 Power Station ("Dolet Hills") rate rider.

13 **Q. IF YOU DO NOT ADDRESS AN ISSUE OR TAKE A POSITION ON AN ISSUE IN**
14 **YOUR TESTIMONY, SHOULD THAT BE INTERPRETED AS SUPPORTING**
15 **THE COMPANY'S POSITION ON THAT ISSUE?**

16 A. No. Any cost, adjustment, cost of service allocation, or rate making methodology included
17 in SWEPCO's Rate Filing Package ("RFP") that is not addressed in my testimony should
18 not be interpreted as my agreement with SWEPCO's proposals.

1 **III. SUMMARY AND RECOMMENDATIONS**

2 **Q. PLEASE SUMMARIZE YOUR OVERALL RECOMMENDATIONS THAT**
3 **IMPACT SWEPCO'S PROPOSED COST OF SERVICE AND RATE DESIGN**
4 **RECOMMENDATIONS IN THIS PROCEEDING.**

5 A. I recommend applying OPUC witness Ms. Connie Cannady's adjusted revenue
6 requirement to SWEPCO's proposed cost of service model used to develop Schedules P-1
7 through P-7, which results in the adjusted Texas retail jurisdictional customer class revenue
8 requirement. In addition, I recommend the development of a Dolet Hills rate rider to collect
9 the revenue requirement associated with the generation asset separate from the base rates.
10 The rider should be in effect as long as Dolet Hills remains used and useful in providing
11 electric service to SWEPCO's Texas retail customers.

12 **Q. PLEASE SUMMARIZE YOUR ADJUSTMENTS TO SWEPCO'S PROPOSED**
13 **COST OF SERVICE USED TO DEVELOP SCHEDULES P-1 THROUGH P-7.**

14 A. I updated the SWEPCO cost of service model to apply Ms. Cannady's recommended
15 adjustments to SWEPCO's total Company revenue requirement. This adjusted total
16 Company revenue requirement of \$1,340,235,301 was applied to the cost of service model
17 to recalculate the Texas retail jurisdictional revenue requirement and subsequent retail
18 customer class revenue requirement, which were used to develop my recommended base
19 rates.

20 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATION FOR A DOLET HILLS**
21 **RATE RIDER.**

1 A. OPUC witness Ms. Cannady recommends removing all costs and rate base associated with
2 Dolet Hills from SWEPCO's proposed base rates and placing those costs in a separate rate
3 rider for cost recovery.¹ Since Dolet Hills is planned for retirement at the end of 2021,²
4 the rate rider would align the cost recovery (i.e., rate revenues) and costs of operating the
5 power plant with its remaining used and useful life for providing electric service to
6 SWEPCO's customers. The Dolet Hills rate rider should be in effect until the plant's
7 retirement date at the end of 2021. The Dolet Hills rate rider will ensure that the costs
8 associated with operating the generation asset are properly recovered and SWEPCO's
9 customers are not burdened with such costs or return after the generation asset is retired
10 and is no longer used and useful for providing electric service to SWEPCO's customers.
11 The Dolet Hills rate rider better aligns with cost of service and rate design principles than
12 maintaining the related generation plant expenses and return on rate base in base rates,
13 which would continue beyond the generation asset's retirement date.

14 IV. ADJUSTED COST OF SERVICE

15 **Q. PLEASE DESCRIBE HOW YOU ADJUSTED SWEPCO'S PROPOSED COST OF**
16 **SERVICE.**

17 A. I updated SWEPCO's cost of service model used to develop Schedules P-1 through P-7.
18 The cost of service model is included as the attached workpaper. This cost of service
19 update process included:

¹ Direct Testimony Connie Cannady at 5.

² The planned retirement date for Dolet Hills is 2021. See Direct Testimony of Thomas Brice at 6.

- Applying the adjustments to the Company's revenue requirement as described in Ms. Cannady's testimony to the cost of service model to calculate the Texas Jurisdictional costs;
- Reviewing subsequent calculations in SWEPCO's cost of service model to recalculate the cost of service and revenue requirement for each Texas retail customer class; and
- Development of an adjusted Schedule Q-1 to reflect resulting customer class revenues from base rates and total revenues. The adjusted Schedule Q-1 is included as Schedule TMG-1.

Q. WHAT ARE THE RESULTS OF THE ADJUSTED COST OF SERVICE FOR SWEPCO'S TEXAS RETAIL CUSTOMER CLASSES?

A. The table below compares the results of OPUC's recommended revenue requirement for Texas retail customer classes to the original SWEPCO Texas retail customer cost of service and revenue requirement results as filed.

Customer Class	OPUC Recommended Revenue Requirement	Original Revenue Requirement	Difference	
Residential	\$180,097,013	\$188,152,172	(\$8,055,160)	(4.3%)
Commercial / Small Industrial	\$186,349,483	\$195,209,984	(\$8,860,501)	(4.5%)
Large Industrial	\$53,492,609	\$55,793,625	(\$2,301,015)	(4.1%)
Municipal	\$4,248,600	\$4,459,489	(\$210,889)	(4.7%)
Lighting	\$7,637,111	\$7,913,240	(\$276,129)	(3.5%)
Total SWEPCO Texas Retail	\$431,824,816	\$451,528,509	(\$19,703,694)	(4.4%)

1 **Q. HOW WERE THE ORIGINAL SWEPCO PROPOSED COST OF SERVICE AND**
2 **REVENUE REQUIREMENT BY CUSTOMER CLASS RESULTS USED TO**
3 **DEVELOP THE PROPOSED REVENUES FOR SWEPCO'S TEXAS RETAIL**
4 **CUSTOMERS?**

5 A. SWEPCO witness Ms. Jennifer Jackson applied the class revenue requirement included in
6 the cost of service from SWEPCO witness Mr. John Aaron to develop a proposed
7 distribution of the revenue increases to the retail classes and subsequent rates.³

8 **Q. HOW DID YOU APPLY OPUC'S RECOMMENDED COST OF SERVICE**
9 **RESULTS TO THE PROPOSED DISTRIBUTION OF REVENUE IN SWEPCO**
10 **WITNESS MS. JACKSON'S TESTIMONY?**

11 A. I followed the same methodology used by Ms. Jackson to apply OPUC's recommended
12 customer class revenue requirements as calculated in the cost of service to develop the
13 adjusted and OPUC recommended revenue by customer class.

14 **Q. WHAT IS THE DIFFERENCE BETWEEN OPUC'S RECOMMENDED REVENUE**
15 **BY CUSTOMER CLASS AND SWEPCO'S PROPOSAL IN MS. JACKSON'S**
16 **DIRECT TESTIMONY?**

17 A. Ms. Jackson summarized the proposed revenue by SWEPCO Texas retail customers in
18 Schedule Q-1. The SWEPCO proposed revenue by Texas retail customer class is based on
19 and matches the cost of service results. The table below summarizes the difference
20 between the OPUC recommended base rate revenues by customer class using the OPUC

³ Direct Testimony of Jennifer Jackson at 6.

recommended cost of service results and SWEPCO's originally proposed base rate revenues in Schedule Q-1. Schedule TMG-1 is the OPUC adjusted Schedule Q-1 and further details recommended rates by customer class.

Class	OPUC Recommended Base Rate Revenues	SWEPCO Proposed Base Rate Revenues	Difference	
Residential	\$180,097,013	\$188,152,172	(\$8,055,160)	(4.3%)
Commercial / Small Industrial	\$186,349,483	\$195,209,984	(\$8,860,501)	(4.5%)
Large Industrial	\$53,492,609	\$55,793,625	(\$2,301,015)	(4.1%)
Municipal	\$4,248,600	\$4,459,489	(\$210,889)	(4.7%)
Lighting	\$7,637,111	\$7,913,240	(\$276,129)	(3.5%)
Total SWEPCO Texas Firm Retail	\$431,824,816	\$451,528,509	(\$19,703,694)	(4.4%)

Q. WHAT IS THE RESULTING DIFFERENCE BETWEEN OPUC'S RECOMMENDED BASE RATE REVENUE BY CUSTOMER CLASS AND SWEPCO'S PRESENT BASE RATES (I.E., CURRENT RATES)?

A. The table below compares OPUC's recommended base rate revenues to SWEPCO's present base rate revenues (i.e., current customer class rates) in SWEPCO's original RFP.

Class	OPUC Recommended Base Rate Change	SWEPCO Present Base Rate Revenues¹	Base Rate Increase
Residential	\$180,097,013	\$147,077,995	22.5%
Commercial / Small Industrial	\$186,349,483	\$146,798,138	26.9%
Large Industrial	\$53,492,609	\$41,956,723	27.5%
Municipal	\$4,248,600	\$3,929,551	8.1%
Lighting	\$7,637,111	\$6,740,893	13.3%
Total SWEPCO Texas Firm Retail	\$431,824,816	\$346,503,301	24.6%
Notes: 1. Exhibit JLJ-1: Present Rate Schedule Revenue			

1 **Q. WHAT IS THE RESULTING DIFFERENCE BETWEEN OPUC'S**
2 **RECOMMENDED TOTAL RATE REVENUE BY CUSTOMER CLASS AND**
3 **SWEPCO'S PRESENT TOTAL REVENUES (I.E., CURRENT RATES)?**

4 A. The table below compares OPUC's recommended total revenues to SWEPCO's present
5 total rate revenues (i.e., current customer class base rate and fuel revenues) in SWEPCO's
6 original RFP.

Class	OPUC Recommended Total Revenue¹	SWEPCO Present Total Revenues²	Total Rate Increase
Residential	\$247,389,553	\$214,370,535	15.4%
Commercial / Small Industrial	\$282,348,978	\$242,797,633	16.3%
Large Industrial	\$97,511,591	\$85,975,704	13.4%
Municipal	\$6,954,785	\$6,635,736	4.8%
Lighting	\$10,222,147	\$9,325,931	9.6%
Total SWEPCO Texas Firm Retail	\$644,427,053	\$559,105,539	15.3%
Notes: 1. OPUC base rate recommended revenues plus fuel revenue from Exhibit JLJ-1. 2. Exhibit JLJ-1: Sum of present rate schedule revenue and fuel revenue.			

7 **Q. HOW DO THE RESULTS FOR THE BASE RATE INCREASES USING THE**
8 **OPUC RECOMMENDED BASE RATE REVENUES COMPARE TO THE**
9 **ORIGINAL BASE RATE AND TOTAL RATE CHANGES AS PROPOSED IN**
10 **SWEPCO'S RFP?**

11 A. The table below compares the OPUC recommended base rate and total rate changes to
12 SWEPCO's original proposal as reflected in the rate filing package.

Class	Original SWEPCO Base Rate Change¹	OPUC Recommended Base Rate Change	Original SWEPCO Total Rate Change²	OPUC Recommended Total Rate Change
Residential	27.9%	22.5%	19.2%	15.4%
Commercial / Small Industrial	33.0%	26.9%	19.9%	16.3%
Large Industrial	33.0%	27.5%	16.1%	13.4%
Municipal	13.5%	8.1%	8.0%	4.8%
Lighting	17.4%	13.3%	12.6%	9.6%
Total SWEPCO Texas Firm Retail	30.3%	24.6%	18.8%	15.3%
Notes: 1. Exhibit JLJ-1. Note Municipal and Lighting Classes were adjusted in JLJ-1 to match summary customer classes shown in Schedule Q-1. 2. Schedule Q-1.				

V. DOLET HILLS RATE RIDER

Q. WHY DID OPUC WITNESS MS. CANNADY RECOMMEND THE DEVELOPMENT OF A DOLET HILLS RATE RIDER?

A. As OPUC witness Ms. Cannady's testimony summarizes, the rate rider would align the cost recovery (i.e., rate revenues) and costs of operating Dolet Hills with its remaining used and useful life in providing electric service to SWEPCO's customers.⁴ Since Dolet Hills is planned for retirement at the end of 2021, if it is kept in the calculation of SWEPCO's base rates, it would remain in base rates until the Company files a new rate application at the Commission. Thus, SWEPCO would continue to recover a return on the generation asset and related expenses well after Dolet Hills is retired and no longer used and useful in providing electric service to SWEPCO's Texas retail customers.

⁴ Direct Testimony Connie Cannady at 5.

1 **Q. IS THERE COMMISSION PRECEDENT FOR A RATE RIDER SIMILAR TO**
2 **YOUR RECOMMENDED DOLET HILLS RATE RIDER?**

3 A. Yes. Rate riders or cost recovery factors, such as the distribution cost recovery factor
4 (“DCRF”), transmission cost recovery factor (“TCRF”), and generation cost recovery rider
5 (“GCRR”) are common in the electric industry in Texas. SWEPCO routinely develops
6 cost recovery factors as noted in SWEPCO witness Mr. Aaron’s direct testimony.⁵

7 **Q. WHY ARE THESE COST RECOVERY FACTORS AND RATE RIDERS**
8 **DEVELOPED AND USED?**

9 A. Cost recovery factors and rate riders are developed to allow electric utilities to recover
10 costs or charges that otherwise are not currently recovered in base rates. The riders allow
11 electric utilities to separate and track expenses specific to an activity or asset type (e.g.,
12 regulatory upgrades, generation assets, or transmission costs) and allow electric utilities to
13 recover those costs in revenues from a rate rider or cost recovery factor that is not included
14 in its base rates. This mechanism allows electric utilities to properly recover costs from
15 retail customers, while ensuring those customers only pay for expenses or assets that are
16 used and useful in providing electric service while the rate rider or cost recovery factor is
17 charged to customers.

18 **Q. HOW LONG WOULD THE RECOMMENDED DOLET HILLS RATE RIDER BE**
19 **IN EFFECT?**

20 A. The rate rider should apply to customer bills until the Dolet Hills planned retirement at the

⁵ Direct Testimony of John Aaron at 27.

1 end of 2021.⁶

2 **Q. HOW DID YOU CALCULATE THE DOLET HILLS RATE RIDER?**

3 A. I used OPUC Witness Ms. Cannady's Schedule CTC-3A as the basis for the total costs to
4 recover in the rate rider. The total Dolet Hills rate rider revenue requirement is \$13,
5 371,343. I then divided the total Dolet Hills revenue requirement by the SWEPCO Texas
6 retail customer total energy consumption adjusted for weather and customer growth of
7 6,923,836,788 kWh,⁷ which was used in the Company's rate design to calculate an energy-
8 based rate rider.

9 **Q. WHAT IS THE RESULT OF THIS DOLET HILLS RATE RIDER**
10 **CALCULATION?**

11 A. The Dolet Hills rate rider is \$0.00193 per kWh and would be charged to SWEPCO's Texas
12 retail customers while Dolet Hills is operating and used and useful in providing electric
13 service to the Company's customers.

14 **Q. WHAT CUSTOMERS WOULD PAY THE DOLET HILLS RATE RIDER?**

15 A. All SWEPCO Texas retail customers would pay the Dolet Hills rate rider.

16 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

17 A. Yes, it does. However, I reserve the right to amend and supplement my testimony based
18 on the receipt of additional information from the Company in response to pending RFIs.

⁶ Direct Testimony of Thomas Brice at 6.

⁷ Direct Testimony of Jennifer Jackson, Exhibit JLJ-1.

SCHEDULE TMG-1

Schedule TMG-1
Adjusted Schedule Q-1

SOUTHWESTERN ELECTRIC POWER COMPANY
TEXAS JURISDICTION
FOR TEST YEAR ENDED MARCH 31, 2020
REVENUE SUMMARY

Class	Tariff Codes	Base Revenue			Fuel Revenue			Total Revenue			Difference		
		Unadjusted	Adjusted	Proposed	Unadjusted	Adjusted	Proposed	Unadjusted	Adjusted	Proposed	\$ Difference	% Difference	
Residential													
Residential	12,15,16,19,37	145,847,740	146,937,937	179,926,336	65,346,897	67,230,029	67,230,029	211,194,637	214,167,966	247,156,365	32,988,399	15 40%	
Residential DG	61	111,939	140,058	170,677	48,886	62,511	62,511	160,825	202,569	233,187	30,619	15 12%	
Total Residential		145,959,679	147,077,995	180,097,013	65,395,783	67,292,540	67,292,540	211,355,462	214,370,535	247,389,553	33,019,018	15 40%	
Commercial/Small Industrial													
Light & Power Sec	60,63,240,241,243	102,133,868	99,913,765	126,674,289	67,264,906	67,275,447	67,275,447	169,398,773	167,189,212	193,949,736	26,760,524	16 01%	
Light & Power Pn	66,246,249,251,252,254,277	24,426,388	23,827,679	30,322,335	20,295,846	20,042,256	20,042,256	44,722,235	43,869,934	50,364,591	6,494,657	14 80%	
General Service w/ Demand	200,205,207,210-215,224	16,983,756	16,988,207	21,156,749	6,286,881	6,388,884	6,388,884	23,270,637	23,377,091	27,545,633	4,168,542	17 83%	
General Service No Demand	202,208,218,219	5,694,680	5,669,225	7,706,190	2,042,607	2,061,022	2,061,022	7,737,287	7,730,247	9,767,212	2,036,964	26 35%	
Cotton Gin	253	231,688	265,617	324,594	136,856	156,913	156,913	368,544	422,530	481,507	58,977	13 96%	
General Service DG	281	10,344	10,162	12,821	3,554	3,554	3,554	13,898	13,716	16,375	2,659	19 38%	
Light & Power Sec DG	291	125,745	123,483	152,505	71,418	71,418	71,418	197,164	194,901	223,923	29,022	14 89%	
Total Commercial/Small Industrial		149,606,469	146,798,138	186,349,483	96,102,068	95,999,495	95,999,495	245,708,537	242,797,633	282,348,978	39,551,345	16 29%	
Large Industrial													
Metal Melting Service Trans	318,321	7,037,212	1,498,929	1,911,727	8,499,414	1,613,932	1,613,932	15,536,626	3,112,861	3,525,659	412,798	13 26%	
Metal Melting Service Dist Pn	325	1,635,315	1,402,858	1,771,982	1,289,394	1,137,979	1,137,979	2,924,709	2,540,837	2,909,961	369,124	14 53%	
Oilfield Pn	330	10,865,564	10,636,387	13,453,920	11,690,151	11,574,972	11,574,972	22,555,715	22,211,359	25,028,892	2,817,534	12 69%	
Oilfield Sec	331	51,481	588,848	735,363	55,917	610,838	610,838	107,398	1,199,686	1,346,201	146,515	12 21%	
Metal Melting Service Dist Sec	335	203,977	143,749	179,827	85,962	61,756	61,756	289,939	205,506	241,583	36,078	17 56%	
Large Light & Power Trans	342,344	21,882,045	22,387,847	28,669,125	23,558,241	24,118,872	24,118,872	45,440,286	46,506,719	52,787,997	6,281,278	13 51%	
Large Light & Power Pn	351	5,116,114	5,298,104	6,770,665	4,866,020	4,900,632	4,900,632	10,002,133	10,198,736	11,671,298	1,472,561	14 44%	
Total Large Industrial		46,791,707	41,956,723	53,492,609	50,065,099	44,018,981	44,018,981	96,856,806	85,975,704	97,511,591	11,535,886	13 42%	
Municipal													
Municipal Pumping	541,543,550,553	2,292,748	2,279,333	2,452,713	1,851,384	1,868,449	1,868,449	4,144,133	4,147,782	4,321,162	173,381	4 18%	
Municipal Service	544,548	1,661,692	1,650,219	1,795,887	829,955	837,736	837,736	2,491,648	2,487,955	2,633,623	145,668	5 85%	
Total Municipal		3,954,441	3,929,551	4,248,600	2,681,340	2,706,185	2,706,185	6,635,780	6,635,736	6,954,785	319,049	4 81%	
Lighting													
Outdoor Private & Area Lighting	90-143	4,199,394	4,150,616	4,732,709	1,535,151	1,536,642	1,536,642	5,734,544	5,687,258	6,269,351	582,093	10 24%	
Customer Owned Lighting	203,204,532	296,657	293,022	382,866	206,661	207,983	207,983	503,317	501,005	590,848	89,843	17 93%	
Municipal Public & Hwy Street Lighting	521,528,529,535,538	2,299,175	2,267,085	2,490,051	809,025	809,002	809,002	3,108,200	3,076,087	3,299,052	222,966	7 25%	
Public & Hwy Street Lighting	534,539,739	31,163	30,170	31,485	31,361	31,411	31,411	62,524	61,581	62,896	1,315	2 14%	
Total Lighting		6,826,388	6,740,893	7,637,111	2,582,197	2,585,037	2,585,037	9,408,585	9,325,930	10,222,147	896,217	9 61%	
Total SWEPCO Texas Firm Retail		353,138,684	346,503,301	431,824,816	216,826,487	212,602,238	212,602,238	569,965,170	559,105,538	644,427,053	85,321,515	15 26%	
1													
Non-Firm													
Interruptible Power Service	320	1,678,830	-	-	2,161,101	-	-	3,839,931	-	-	-	-	
Total Non-Firm		1,678,830	-	-	2,161,101	-	-	3,839,931	-	-	-	-	
Total SWEPCO TEXAS RETAIL		354,817,514	346,503,301	431,824,816	218,987,588	212,602,238	212,602,238	573,805,102	559,105,538	644,427,053	85,321,515	15.26%	

ATTACHMENT A

Tony Georgis brings 20 years of experience in the consulting/utilities industry focusing on the energy, water, and waste resources industries. He is the Managing Director of NewGen Strategy and Solutions, LLC's Energy Practice. His work includes various assignments for utilities, local governments, and private industry, including sustainability strategy, strategic planning studies, expert witness testimony, financial and economic analyses, cost of service and rate studies, energy efficiency, and market research.

In support of sustainability strategy projects, Tony has developed frameworks, optimization, and decision models for sustainability program prioritization and monetization of climate change regulatory, market, and physical impacts. He has also been published in trade journals such as Resource Recycling, Utility Automation and Engineering T&D and has spoken on this topic at several industry conferences.

EDUCATION

- Master of Business Administration, Finance Specialization, Texas A&M University
- Bachelor of Science in Mechanical Engineering, Texas A&M University

PROFESSIONAL REGISTRATIONS / CERTIFICATIONS

- Registered Professional Engineer (PE) Mechanical, Colorado
- Registered Professional Engineer (PE) Mechanical, Louisiana

KEY EXPERTISE

- Sustainability
- Strategic Planning
- Financial / Economic Analysis
- Cost of Service and Rate Design

RELEVANT EXPERIENCE

Sustainability, Energy Strategy, and Strategic Planning

Mr. Georgis has led and managed the development of strategic plans and Roadmaps for utilities, energy agencies and municipal governments to guide decision making in increasing complex business environments. His strategic planning experience includes energy, water, wastewater, and solid waste utilities in addition to local government entities. In support of strategic planning engagements, Mr. Georgis often facilitates internal planning teams and external stakeholder engagement activities to facilitate broad and/or targeted stakeholder input to the plans. Strategic plan or Roadmap development typically include overarching strategic elements such as the organization's vision/mission; tactical components such as projects and activities supporting and ensuring implementation; and tracking/reporting tools for the organization's measurement of progress to the plan.

Mr. Georgis has also led the development of clean energy and sustainability (or CSR) plans for cities, counties and utilities to improve triple bottom line (economic, environmental, and social) and energy performance. Mr. Georgis utilizes an enterprise-wide approach to sustainability in order to manage regulatory, customer, and financial demands while improving the triple bottom line. He has facilitated the development of city-wide sustainability plans, serving as a sustainability subject matter expert while forging collaboration among internal and external stakeholders including city/utility staff, key department managers, community representatives, utility customers, and non-profit or non-governmental organizations (NGOs). In support of sustainability planning efforts, Mr. Georgis has developed optimization models to prioritize and identify the "next best dollar spent" in pursuit of sustainability

Tony Georgis

Managing Director, Energy Practice

goals while estimating total costs to implement. He has also implemented sustainability auditing/reporting tools such as GHG inventories/reporting and development of a utility-tailored version of the Global Reporting Initiative (GRI).

Mr. Georgis' clients for sustainability, energy strategy, and strategic planning include:

- City of Fort Collins, Colorado
- Fort Collins Utilities, Colorado
- Loudoun County, Virginia
- Tampa Bay Water, Florida
- City of Colorado Springs, Colorado
- City of Longmont, Colorado
- City of El Paso, Texas
- Western Area Power Administration, Colorado
- Lakeland Electric, Florida
- City of Palo Alto Utilities, California

Cost of Service and Rate Design

In his role as senior consultant and project manager, Mr. Georgis leads numerous utility financial planning, cost of service, and rate design projects. Specific tasks typically include the development of the revenue requirement, functionalization of costs, allocation of costs to customer classes, review of existing customer class criteria, evaluation of line extension and facilities charges, rate design, and transitioning of models for the client's future use. He has also led the development of financial forecasting models to support long-term capital, expense, and revenue budgeting and decision making. Mr. Georgis routinely facilitates workshops in support of developing utility rate strategies or rate studies and presents study and financial recommendations to governing bodies, boards, and city councils. Mr. Georgis' clients for cost of service and rate design include:

- American Samoa Power Authority
- U.S. Army; Huntsville, Alabama
- Colorado Springs Utilities, Colorado
- La Plata Electric Association, Colorado
- Vernon Gas and Electric, California
- Alameda Municipal Power, California
- Anaheim Public Utilities, California
- Merced Irrigation District, California
- Alameda Municipal Power, California
- Glendale Water and Power, California
- Imperial Irrigation District, California
- Pasadena Water and Power, California
- Lafayette Utilities System, Louisiana
- City Utilities, Springfield, Missouri
- Lincoln Electric System, Nebraska
- Farmington Electric Utility, New Mexico
- Cleveland Public Power, Ohio
- Lubbock Power and Light, Texas
- City of Weatherford, Texas
- New Braunfels Utilities, Texas
- Austin Energy, Texas
- City of Garland, Texas
- Benton Public Utility District, Washington
- Arizona Public Service, Arizona

Economic, Financial or Market Analyses

Mr. Georgis often provides technical, financial, and advisory support services for various energy and utility related projects. He is an expert in developing financial pro formas, bond financings, performing scenario analyses, and evaluating market conditions to support project financing or feasibility decision making. He has analyzed technical assumptions, optimized project financing, performed scenario/sensitivity analyses, and assisted clients in bidding processes. He has provided economic analyses of utility scale renewable energy projects, power plant fuel conversions, LNG terminals, conventional/renewable distributed energy resources, and DSM/demand response program benefits. Mr. Georgis' clients for economic, financial or market analyses include:

- Terrebonne Parrish, Louisiana
- Hawaii Gas Company, Oahu, Hawai'i
- U.S. Army; Huntsville, Alabama
- Florida Municipal Power Agency, Florida
- Austin Energy, Texas
- CalRecycle, California
- Arizona Power Authority, Arizona
- Water and Power Authority, US Virgin Islands
- Solid Waste Authority of Central Ohio, Ohio
- Freeport Container Port, Grand Bahama
- Maryland Energy Administration, Maryland
- ISO-New England, Massachusetts
- Niobrara Energy Development, Colorado
- Fort Collins Utilities, Colorado

PRESENTATIONS AND PUBLICATIONS

Mr. Georgis has presented at numerous industry associations and conferences, providing training for utility staff, and published several trade journal articles. These presentations, articles, and training have focused on utility finance, strategic planning, market trends/opportunities, and sustainability. Mr. Georgis' presentations and publications are displayed below.

Industry Presentations

- Tire Industry Association Recycling Conference 2008: *Selling Tire-derived Products to the Architectural and Construction Markets*
- Tire Industry Association Recycling Conference 2009: *Carbon Credits and Recycling Products*
- Energy Utility and Environmental Conference 2010: *Evolution and Optimization of Energy Efficiency and Smart Grid Measures*
- Tire Industry Association Scrap to Profit 2010: *Evolution of the Carbon Markets and Opportunities for the Scrap Tire Industry*
- Inter-American Development Bank 2010: *Transportation Sustainability and Climate Change Seminar*
- University of Colorado Denver Managing for Sustainability 2012: *Regulatory Drivers for Sustainability*
- Global Commerce Conference 2010: *Leadership in Sustainability – Sustainability Decision Making, Implementation and Reporting*
- Platts Energy Markets Webinar 2010: *SEC Guidance on Climate Change Disclosures*
- Association of Climate Change Officers 2010: *SEC Climate Change Disclosure Guidance*
- Harvard University Zofnass Program for Sustainable Infrastructure 2011: *Tools and Frameworks to Drive the Business Case for Sustainability*
- Washington PUD Association Finance Officers 2016: *Balancing Aging Infrastructure, Rates, and Residential Demand*
- APPA National Conference – Preconference Seminars 2017, 2018, 2019: *Distributed Energy Resources: Risks and Opportunities*
- APPA Business and Finance Conference Preconference Seminar 2019: *Distributed Energy Resources: Risks and Opportunities*
- APPA Legislative Rally Preconference Seminar 2020: *Demystifying Distributed Energy Resources*
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Industry Publications and Articles

- *Growing Role for Demand Response in ISO Operations*. Utility Automation and Engineering T&D, November 2008
- *Recycling and Climate Change: A Primer*. Resource Recycling, August 2009
- *Recycling and Climate Change: Opportunities for Recycling as a Climate Change Strategy*. Resource Recycling, September 2009

Record of Testimony: Tony Georgis

Utility	Proceeding	Subject	Before	Client	Date
1. City of Pasadena – Pasadena Water and Power	BC 677632	Komesar vs. City of Pasadena; State of California Proposition 218, City General Fund Transfer from Utility	Superior Court of the State of California for the County of Los Angeles	Jarvis, Fay and Gibson, LLP; City of Pasadena	2021
2. City of Lubbock, Lubbock Power & Light	SOAH Docket No. 473-21-0043 PUC Docket No. 51100	Application of the City of Lubbock for Authority to Establish Initial Wholesale Transmission Rates and Tariffs	State Office of Administrative Hearings, Public Utility Commission of Texas	Lloyd Gosselink Rochelle & Townsend, P.C.	2020
3. Northern Indiana Public Service Company LLC (NIPSCO)	Cause No. 45159	Petition of Northern Indiana Public Service Company LLC (NIPSCO) Authority to 1) Modify Electric Utility Rates; 2) Approval of New Schedules of Rates and Changes, General Rules and Regulations and Riders; 3) Approval of Revised Common and Electric Depreciation Rates; 4) Accounting Relief; and 5) Approval of New Service Structure for Industrial Rates	Indiana Utility Regulatory Commission	Bose McKinney & Evans LLP, United States Steel Corporation	2019
4. CenterPoint Energy Houston Electric, LLC	SOAH Docket No. 473-14-3897 PUC Docket No. 42560	Application of CenterPoint Energy Houston Electric, LLC for Approval of an Adjustment to its Energy Efficiency Cost Recovery Factor	State Office of Administrative Hearings, Public Utility Commission of Texas	Lloyd Gosselink Rochelle & Townsend, P.C., Gulf Coast Coalition of Cities	2014

WORKPAPERS

**PROVIDED
ELECTRONICALLY**

Schedule TMG-1
Adjusted Schedule Q-1

SOUTHWESTERN ELECTRIC POWER COMPANY
TEXAS JURISDICTION
FOR TEST YEAR ENDED MARCH 31, 2020
REVENUE SUMMARY

Class	Tariff Codes	Base Revenue			Fuel Revenue			Total Revenue			Difference		
		Unadjusted	Adjusted	Proposed	Unadjusted	Adjusted	Proposed	Unadjusted	Adjusted	Proposed	\$ Difference	% Difference	
Residential													
Residential	12,15,16,19,37	145,847,740	146,937,937	179,926,336	65,346,897	67,230,029	67,230,029	211,194,637	214,167,966	247,156,365	32,988,399	15.40%	
Residential DG	61	111,939	140,058	170,677	48,888	62,511	62,511	160,825	202,569	233,187	30,619	15.12%	
Total Residential		145,959,679	147,077,995	180,097,013	65,395,783	67,292,540	67,292,540	211,355,462	214,370,535	247,389,553	33,019,018	15.40%	
Commercial/Small Industrial													
Light & Power Sec	60,63,240,241,243	102,133,868	99,913,765	126,674,289	67,264,906	67,275,447	67,275,447	169,398,773	167,189,212	193,949,736	26,760,524	16.01%	
Light & Power Pn	66,246,249,251,252,254,277	24,426,388	23,827,679	30,322,335	20,295,846	20,042,256	20,042,256	44,722,235	43,869,934	50,364,591	6,494,657	14.80%	
General Service w/ Demand	200,205,207,210-215,224	16,983,756	16,988,207	21,156,749	6,286,881	6,388,884	6,388,884	23,270,637	23,377,091	27,545,633	4,168,542	17.83%	
General Service No Demand	202,208,218,219	5,694,680	5,669,225	7,706,190	2,042,607	2,061,022	2,061,022	7,737,287	7,730,247	9,767,212	2,036,964	26.35%	
Cotton Gin	253	231,688	265,617	324,594	136,856	156,913	156,913	368,544	422,530	481,507	58,977	13.96%	
General Service DG	281	10,344	10,162	12,821	3,554	3,554	3,554	13,898	13,716	16,375	2,659	19.38%	
Light & Power Sec DG	291	125,745	123,483	152,505	71,418	71,418	71,418	197,164	194,901	223,923	29,022	14.89%	
Total Commercial/Small Industrial		149,606,469	146,798,138	186,349,483	96,102,068	95,999,495	95,999,495	245,708,537	242,797,633	282,348,978	39,551,345	16.29%	
Large Industrial													
Metal Melting Service Trans	318,321	7,037,212	1,498,929	1,911,727	8,499,414	1,613,932	1,613,932	15,536,626	3,112,861	3,525,659	412,798	13.26%	
Metal Melting Service Dist Pn	325	1,635,315	1,402,858	1,771,982	1,289,394	1,137,979	1,137,979	2,924,709	2,540,837	2,909,961	369,124	14.53%	
Oilfield Pn	330	10,865,564	10,636,387	13,453,920	11,690,151	11,574,972	11,574,972	22,555,715	22,211,359	25,028,892	2,817,534	12.69%	
Oilfield Sec	331	51,481	588,848	735,363	55,917	610,838	610,838	107,398	1,199,886	1,346,201	146,515	12.21%	
Metal Melting Service Dist Sec	335	203,977	143,749	179,827	85,982	61,756	61,756	289,939	205,506	241,583	36,078	17.56%	
Large Light & Power Trans	342,344	21,882,045	22,387,847	28,668,125	23,558,241	24,118,872	24,118,872	45,440,286	46,506,719	52,787,997	6,281,278	13.51%	
Large Light & Power Pn	351	5,116,114	5,298,104	6,770,665	4,886,020	4,900,632	4,900,632	10,002,133	10,198,736	11,671,298	1,472,561	14.44%	
Total Large Industrial		46,791,707	41,956,723	53,492,609	50,065,099	44,018,981	44,018,981	96,856,806	85,975,704	97,511,591	11,535,886	13.42%	
Municipal													
Municipal Pumping	541,543,550,553	2,292,748	2,279,333	2,452,713	1,851,384	1,868,449	1,868,449	4,144,133	4,147,782	4,321,162	173,381	4.18%	
Municipal Service	544,548	1,661,692	1,650,219	1,795,887	829,955	837,736	837,736	2,491,648	2,487,955	2,633,623	145,668	5.85%	
Total Municipal		3,954,441	3,929,551	4,248,600	2,681,340	2,706,185	2,706,185	6,635,780	6,635,736	6,954,785	319,049	4.81%	
Lighting													
Outdoor Private & Area Lighting	90-143	4,199,394	4,150,616	4,732,709	1,535,151	1,536,642	1,536,642	5,734,544	5,687,258	6,269,351	582,093	10.24%	
Customer Owned Lighting	203,204,532	296,657	293,022	382,866	206,661	207,983	207,983	503,317	501,005	590,848	89,843	17.93%	
Municipal Public & Hwy Street Lighting	521,528,529,535,538	2,289,175	2,267,085	2,490,051	809,025	809,002	809,002	3,108,200	3,076,087	3,299,052	222,966	7.25%	
Public & Hwy Street Lighting	534,539,739	31,163	30,170	31,485	31,361	31,411	31,411	62,524	61,581	62,896	1,315	2.14%	
Total Lighting		6,826,388	6,740,893	7,637,111	2,582,197	2,585,037	2,585,037	9,408,585	9,325,930	10,222,147	896,217	9.61%	
Total SWEPCO Texas Firm Retail		353,138,684	346,503,301	431,824,816	216,826,487	212,602,238	212,602,238	569,965,170	559,105,538	644,427,053	85,321,515	15.26%	
1													
Non-Firm													
Interruptible Power Service	320	1,678,830	-	-	2,161,101	-	-	3,839,931	-	-	-	-	
Total Non-Firm		1,678,830	-	-	2,161,101	-	-	3,839,931	-	-	-	-	
Total SWEPCO TEXAS RETAIL		354,817,514	346,503,301	431,824,816	218,987,588	212,602,238	212,602,238	573,805,102	559,105,538	644,427,053	85,321,515	15.26%	